

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL PROGRAM

REGION 4

245 WEST BROADWAY, SUITE 350

LONG BEACH, CA 90802

(213) 590-4868



April 5, 1991

Ms. Ruth G. Pullen
Environmental Engineer
Solar Turbines, Inc. (Harbor Plant)
2200 Pacific Highway
P.O. Box 85376
San Diego, CA 92138-5376
EPA I.D.# CAD008314908

Dear Ms. Pullen:

REPORT OF VIOLATION

On February 20, 1991, Nirupma Kumari and Abdul Beig, representatives from this Department, inspected your facility located at 2200 Pacific Highway, San Diego, California 92138-5376.

As a result of that inspection, violations of hazardous waste statutes and regulations were identified.

The specified violations and a required schedule of compliance are listed below. Failure to correct the identified violations within the schedule provided will result in DHS citing you for continuing/additional violations.

I. Violations

1. Title 22, California Code of Regulations (Cal. Code Regs.), section 67104 and Hazardous Waste Facility Permit (HWFP), section III. k. Approved Operation Plan (OP), section C. VIII. D.

The facility violated title 22, Cal. Code Regs., section 67104, and Hazardous Waste Facility Permit (HWFP), section III. k.; Approved Operation Plan (OP), section C. VIII. D., in that on or about February 20, 1991, the facility failed to inspect hazardous waste yard, empty hazardous waste drum storage yard and Chapel sump in the daily and weekly inspections.

2. Title 22, Cal. Code Regs., section 67243(a) and HWFP, section III. C. 1.b.

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The facility violated title 22, Cal. Code Regs., section 67243(a) and HWFP, section III. C. 1. b., in that on or about February 20, 1991, the facility failed to keep the container holding hazardous waste closed during storage, except when it is necessary to add or remove the waste.

3. Title 22, Cal. Code Regs., section 66508(a)(2) and HWFP, section III. C. 1. d. (5).

The facility violated title 22, Cal. Code Regs., section 66508(a)(2) and HWFP, section III. C. 1. d. (5), in that on or about February 20, 1991, the facility failed to mark the initial date of accumulation on five 55-gallon drums containing hazardous waste.

Inspectors found one 55-gallon drum in oil/water separation unit holding waste oil, coolant and oil soaked pigs; two 55-gallon drums containing hazardous waste in the hazardous waste yard; and two 55-gallon drums containing still bottoms from 1,1,1 trichloroethane distillation in TCA distillation unit, which were not marked with the initial date of accumulation.

4. Title 22, Cal. Code Regs., section 66508(a)(3) and HWFP, section III. C. 1. d.

The facility violated title 22, Cal. Code Regs., section 66508(a)(3) and HWFP section III. C. 1. d., in that on or about February 20, 1991, the facility failed to label or marked clearly the container holding hazardous waste with the words "Hazardous Waste".

5. Title 22, Cal. Code Regs., section 66508(c) and HWFP, section III. C. 1. d. (1).

The facility violated title 22, Cal. Code Regs., section 66508(c) and HWFP, section III. C. 1. d. (1), in that on or about February 20, 1991, the facility failed to label the composition and physical state of the waste, the particular hazardous properties of the waste and the address of the person producing the waste on the container.

6. Title 22, Cal. Code Regs., section 67124 and HWFP, section III. p.

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The facility violated title 22, Cal. Code Regs., section 67124 and HWFP, section III. p., in that on or about February 20, 1991, the facility failed to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in an emergency.

7. Title 22, Cal. Code Regs., section 67243(b) and HWFP, section III. C. 1. c., g., h..

The facility violated title 22, Cal. Code Regs., section 67243(b) and HWFP, section III. C. 1. c., g., h., in that on or about February 20, 1991, the facility stored a 55-gallon container of hazardous waste in the hazardous waste yard in a manner that failed to prevent rupturing or leaking of the container. The facility also stored five 55-gallon containers holding hazardous waste in the hazardous waste yard in a manner which may rupture the container or cause it to leak.

8. Hazardous Waste Facility Permit, section III. C. 1. a. and Operation Plan, section II. b. 3. g. (3).

The facility violated HWFP section III. C. 1. a. and Operation Plan, section II. b. 3. g. (3), in that on or about February 20, 1991, the facility failed to store the fifteen 55-gallon containers holding hazardous waste inside the area designated in the approved operation plan.

9. Title 22, Cal. Code Regs., section 66484(g).

The facility violated title 22, Cal. Code Regs., section 66484(g), in that on or about February 20, 1991, the facility failed to keep copy of the manifest signed by the facility operator.

10. Title 40, Code of Federal Regulations (40 CFR), section 268.7(a)(b) and Title 22, Cal. Code Regs., section 67740.

The facility violated, 40 CFR, section 268.7(a)(b) and title 22, Cal. Code Regs., section 67740, in that on or about February 20, 1991, land disposal restrictions notifications were not kept at the facility as required.

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11. Title 22, Cal. Code Regs., sections 67102, 67740, and HWFP, section III. I.

The facility violation title 22, Cal. Code Regs., section 67102 and HWFP, section III. I., in that on or about February 20, 1991, the facility failed to follow the waste analysis plan as required in the permit and approved operation plan.

12. HWFP, section IV.

The facility violated HWFP, section IV compliance schedule, in that on or about February 20, 1991, the facility failed to submit the revised Part A application within 60 days following the effective date of the permit.

13. Title 22, Cal. Code Regs., section 67121(c).

The facility violated title 22, Cal. Code Regs., section 67121(c), in that on or about February 20, 1991, the facility failed to install an eye wash and safety showers in oil/water separation room, coolant recycling 1,1,1 trichloroethane distillation unit, and Chapel sump to be used for decontamination in case of an emergency.

14. Title 22, Cal. Code Regs., section 67245 and HWFP, section II. I. 1.

The facility violated section 67245(c) and HWFP, section II. I. 1., in that on or about February 20, 1991, the facility failed to submit to the Department a written statement signed by a professional civil engineer registered in California that indicates that the containment system is suitably designed to achieve the requirements of this section.

15. Title 22, Cal. Code Regs., section 67105 and HWFP, section III. L.

The facility violation title 22, Cal. Code Regs., section 67105 and HWFP, section III. L., in that on or about February 20, 1991, the facility failed to follow its training program as required in the permit and the approved operation plan.

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II. Correct violations upon receipt of this Report.

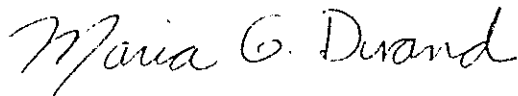
Please send written certification to this office by May 6, 1991 that the above corrections have been completed.

The Department will conduct a reinspection of Solar Turbine, Inc. (Harbor Drive Plant) located at 2200 Pacific Highway, San Diego, California to verify compliance.

The issuance of the Report of Violations and Schedule of Compliance does not preclude DHS from taking administrative, civil, or criminal action as a result of the violation(s) noted herein.

If you have any questions regarding this Report, please contact Nirupma Kumari at (213) 590-4985.

Sincerely,



Maria Durand
Unit Chief
Surveillance and Enforcement Branch

cc: William F. Soo Hoo
Enforcement Coordinator
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cc: Frank Laguna
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Certified Mail
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Return Receipt Requested